

FENWICK & WEST LLP  
ATTORNEYS AT LAW

JOHN D. TENNERT III (NSB No. 11728)  
jtennert@fennemorelaw.com  
FENNEMORE CRAIG P.C.  
9275 W. Russell Road, Suite 240  
Las Vegas, NV 89148  
Telephone: 702.692.8000  
Facsimile: 702.692.8099

ERIC BALL (admitted *pro hac vice*)  
eball@fenwick.com  
KIMBERLY CULP (admitted *pro hac vice*)  
kculp@fenwick.com  
FENWICK & WEST LLP  
801 California Street  
Mountain View, CA 94041  
Telephone: 650.988.8500  
Fax: 650.938.5200

MOLLY R. MELCHER (admitted *pro hac vice*)  
mmelcher@fenwick.com  
ANTHONY M. FARES (admitted *pro hac vice*)  
afares@fenwick.com  
FENWICK & WEST LLP  
555 California Street, 12th Floor  
San Francisco, CA 94104  
Telephone: 415.875.2300  
Fax: 415.281.1350

*Attorneys for Plaintiff  
Yuga Labs, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

YUGA LABS, INC.,  
Plaintiff,

v.

RYAN HICKMAN,  
Defendant.

Case No.: 2:23-cv-00111-JCM-NJK

**DECLARATION OF JOHN D.  
TENNERT III IN SUPPORT OF  
PLAINTIFF YUGA LABS, INC.'S  
APPLICATION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST  
RYAN HICKMAN**

1 I, John D. Tennert III, declare:

2 1. I am an attorney admitted to practice in Nevada and am a Director with the law firm  
3 of Fennemore Craig, P.C., counsel for Plaintiff Yuga Labs, Inc. ("Plaintiff" or "Yuga Labs") in the  
4 above-captioned matter. I make this declaration based on my own personal knowledge. If called  
5 as a witness, I could testify competently to the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff's Application for Entry of Default  
7 Judgment Against Ryan Hickman ("Hickman").

8 3. On February 9, 2023, I caused Hickman to be served with the Complaint (ECF No.  
9 1) and Summons (ECF No. 5) by substituted service pursuant to Federal Rule of Civil Procedure  
10 5(b)(2)(B)(ii).

11 4. The Declaration of Service was filed with the Court on February 17, 2023 (ECF No.  
12 18).

13 5. Pursuant to Federal Rule of Civil Procedure 12, the deadline for Hickman to respond  
14 was March 2, 2023, and he has yet to answer or otherwise file a response to the Complaint.

15 6. On March 3, 2023, my firm caused to be filed with this Court a Motion for Entry of  
16 Clerk's Default Against Defendant Ryan Hickman ("Motion for Entry of Default"). (ECF No. 19).

17 7. On that same date, Hickman was served with a copy of the Motion for Entry of  
18 Clerk's Default by mail and email. (ECF No. 19-3).

19 8. Thereafter, on March 20, 2023, this Court granted Plaintiff's Motion for Entry of  
20 Default and entered Hickman's default (ECF No. 20; ECF No. 21).

21 9. On March 27, 2023, I caused to be served on Hickman a Notice of Entry of Order  
22 attaching this Court's order granting Plaintiff Yuga Lab, Inc.'s Motion for Entry of Default, as well

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 as the clerk's entry of default via email and mail. (ECF No. 22).

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on March 31, 2023.

4  
5 /s/ John D. Tennert III

6 John D. Tennert III, Esq.  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28